

Exhibit 6

Closure Plan

PENINSULA COMPOST COMPANY, LLC

CLOSURE PLAN

1.0 INTRODUCTION

This Closure Plan describes the activities that Peninsula Compost Company, LLC (“Peninsula”) will employ to close its composting facility in a manner that: 1) minimizes the need for further maintenance; 2) ensures the removal of onsite product and recyclable material inventories; and 3) minimizes the potential environmental impacts of the facility, subsequent to closure, on the surrounding area.

This Closure Plan includes a closure cost estimate based on the removal and final management of the maximum storage volumes permitted at the site. Additionally, the Plan discusses the financial requirements that will be established to ensure that the elements of this Plan can be appropriately implemented.

2.0 SITE DESCRIPTION

The site is located at 601 and 612 Christiana Avenue, Wilmington, DE 19801. The site is on the east side of I-495 Expressway south of the Christina River. The compost facility includes the following operating elements:

- Scale house
- Receiving Building
- Windrow composting
- Screening and product storage
- Biofilter
- Leachate collection
- Storm water collection

3.0 DESCRIPTION OF ACTIVITY

The Peninsula compost facility recycles source separated food waste by using a specialty “in vessel” composting technology in order to produce quality compost and manufactured topsoil for resale in bulk. Food waste generally includes source separated meat, poultry, fish, fruits, vegetables, dairy products and other suitable discarded food materials, along with paper products, packaging, and scrap paper that are routinely mixed with the food waste.

The facility receives food wastes from a variety of sources including restaurants, hotels, casinos, food importers, prisons, universities, colleges, schools, sports venues, and other similar institutions. Additionally, the facility accepts other materials, such as leaves, brush, pallets, wood chips, animal bedding and trees as a carbon source material required for the composting operation. These types of compostable materials are also used for moisture control during the composting process. Sandy soils will also be accepted for blending with compost to produce topsoil. The Peninsula composting facility is designed to recycle 160,000 tons of material per year into compost material. Of the 160,000 tons of material, 120,000 tons will consist of food waste and 40,000 tons will come from leaf and wood type wastes. An additional 40,000 tons of sandy soils will be accepted each year for top soil production.

4.0 PROCEDURES FOR FACILITY CLOSURE

The Closure Plan addresses the removal of both the recyclable materials and finished products that may be stored at the facility and includes: 1) unprocessed materials in the receiving building; 2) the active compost materials curing on the compost pad; 3) finished product (topsoil and compost); and, 4) media material (blended compost and woodchips) from the facility’s biofilter unit. The assumed disposition of these materials in the event of an unexpected facility shutdown is described below.

- **Wood and Yard Waste**

Wood and yard waste from 612 Christiana Avenue is expected to be 470 cy maximum, while wood and yard waste from 601 Christiana Avenue maximum amount is 9,250 cy. The most effective method to meet the required closure demands is to compost this material. The estimated hours to relocate this material from the respective sites for composting are 165 hours.

- **Land Clearing Debris**

Land clearing debris for purposes of a closure cost estimate it has been assumed the bulk materials will be disposed of offsite. Disposal cost is estimated at \$28/ton, while the transport costs are based on 51 hours at \$65/hr and a loading cost is based on 4.5 hours at \$75/hr.

- **Unprocessed Material In the Receiving Building**

Unprocessed material in the Receiving Building will be managed as solid waste and is assumed to require disposal in a landfill. The maximum daily amount of recyclable material that may be accepted in the Receiving Building is 700 tons per day. Based on the facility's operating procedures, the recyclable materials are mixed/blended and moved to the compost storage pad area by the end of each day. Accordingly, the maximum amount of material requiring disposal as solid waste from the Receiving Building would be 700 tons.

- **Compost in Windrows**

The most efficient and environmentally prudent means to manage the material in the windrows is to allow the composting/curing process to go to completion and produce the finished compost product. The normal composting process takes eight weeks to be completed. The material is subsequently screened at the end of eight weeks to make a

finished product. During this eight week period, it would require three front end loaders and operators and the facility's onsite screening equipment to manage the compost materials through the remainder of the compost process. Assuming the compost area is at its maximum capacity (approximately 59,400 cubic yards), a total of 960 equipment/operator hours will be required to process the material in the windrows through the composting cycle.

- **Material in Biofilter**

The biofilter contains 2,000 cubic yards (cy) of compost mixed with wood chips. The most efficient and environmentally prudent means of managing this material is to mix it with the compost in the windrows. It is expected that moving this material in to the windrows for composting will require two loaders and operators for two days (32 equipment/operator hours).

- **Finished Product**

The finished product consists of topsoil and compost. These products can normally be sold to landscapers and agricultural users. For the purposes of this Closure Plan, it is assumed that this product will not produce any revenue. It is assumed that end users of this material will come to the facility to pick up this product if it were available for free. In this case, the cost would be in providing a machine and operator to load trucks with finished product. An estimated time required to remove this material is 120 days or 960 equipment/operator hours.

- **Finished Compost Created During Closure**

As mentioned above the most efficient and environmentally prudent means of managing the raw materials during closure would be to compost the materials. The cost to finish compost created during closure is based on 378 hours for screening material and 1454 hours for loading. Both of these tasks are forecasted at a rate of \$75/hr.

- **Unscreened Compost**

Screening compost that had undergone the compost process prior to closure is estimated to take 43.5 hours for screening and 167.5 hours for loading.

- **Solid Waste**

Removal of solid waste is based on a maximum of 1,125 tons of material to be stored on-site at \$28/ton for disposal plus 167 hours for loading and 120 hours for transportation to the offsite disposal facility.

5.0 CLOSURE COST ESTIMATE

The calculated costs associated with the closure activities as described in this Plan are summarized in Appendix 1 attached. The Closure Cost Worksheet indicates the total calculated closure cost is \$405,335.09.

6.0 FINANCIAL ASSURANCE

Peninsula will establish an appropriate financial assurance mechanism for the closure cost amount indicated in Section 5.0 above. This financial assurance mechanism is consistent with the requirements specified in Section 1301 of the Delaware Regulations Governing Solid Waste, Paragraph 4.1.11.2, and will be updated annually for inflation or whenever a change in the Closure Plan occurs. The financial assurance mechanism for closure will be established and approved by the Department prior to commencing any operation at the facility. Peninsula will keep a copy of the most recent closure cost estimate at the facility during the operating life of the facility.

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Appendix 1

Closure Plan Worksheet

Peninsula Compost Company, LLC
Closure Cost Estimate Based on
July 25, 2013 Secretary's Order

Type/Location	Estimated Volume (tons or tons)	CY or Tons	Disposal	Transportation	Loading/Screening	Total
Wood and Yard Waste (612 Christiana Ave) ¹	470	CY	Put in Process	Put in Process	1.28	\$601.60
Wood and Yard Waste (601 Christiana Ave) ²	9,250	CY	Put in Process	Put in Process	1.27	\$11,747.50
Land Clearing Debris ³	544	Tons	\$28.00	\$6.09	\$0.62	\$18,882.24
Receiving Building (Food and Hactchery Waste) ⁴	700	Tons	\$28.00	\$4.36	\$0.43	\$22,953.00
Biofilter ⁵			Put in Process	Put in Process	\$2,400.00	\$2,400.00
Windrows in Process ⁶	59,400	CY	Put in Process	Put in Process	\$1.21	\$71,874.00
Finished Compost Already Produced at Time of Closure ⁷	18,750	Tons	Customer's cost	Customer's cost	\$3.84	\$72,000.00
Finished Compost Created During Closure ⁸	37,800	CY	Customer's cost	Customer's cost	\$3.63	\$137,214.00
Unscreen Compost ⁹	4,350	CY	Customer's cost	Customer's cost	\$3.64	\$15,834.00
Solid Waste ¹⁰	1,125	Tons	\$28	\$6.93	\$11.14	\$51,828.75
Total Estimate						\$405,335.09

- ¹ Wood and Yard Waste (612 Christiana Avenue) loading is based on the assumption of 8 hours @ \$75/hour
- ² Wood and Yard Waste (601 Christiana Avenue) loading is based on the assumption of 157 hours @ \$75/hour
- ³ Land Clearing Waste transportation is based on the assumption of 51 hours @ \$65/hour and loading is based on 4.5 hours @ \$75/hour
- ⁴ Receiving Building transportation is based on the assumption of 47 hours @ \$65/hour and loading is based on 4 hours @ \$75/hour
- ⁵ Biofilter loading is based on the assumption of 32 hours @ \$75/hour
- ⁶ Windrows in Process loading is based on the assumption of 960 hours @ \$75/hour
- ⁷ Finished Compost at Closure loading is based on the assumption of 960 hours @ \$75/hour
- ⁸ Finished Compost Created During Closure screening is based on 378 hours @ \$75/hour and loading at 1454 hours @ \$75/hour
- ⁹ Unscreen Compost screening is based on 43.5 hours @ \$75/hour and loading at 167.5 hours @ \$75/hour
- ¹⁰ Solid Waste loading is based on 167 hours @ \$75/hour and transportation at 120 hours @ \$75/hour